

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Case No.

21-CR-221

Plaintiff,

v.

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(C); &
18 U.S.C. §§ 924(a)(2), (c)(1)(A)(i), & 922(g)(1)]

JAHMEL J. JOHNSON,

Defendant.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about May 26, 2021, in the State and Eastern District of Wisconsin,

JAHMEL J. JOHNSON

did knowingly and intentionally possess with intent to distribute a controlled substance.

2. The offense involved a mixture and substance containing heroin, a Schedule I controlled substance; a mixture and substance containing cocaine, a Schedule II controlled substance; and oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 26, 2021, in the State and Eastern District of Wisconsin,

JAHMEL J. JOHNSON

did knowingly possess a firearm in furtherance of the drug trafficking crime charged in Count
One of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about May 26, 2021, in the State and Eastern District of Wisconsin,

JAHMEL J. JOHNSON,

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms which, prior to his possession of each, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearms are more fully described as:

- a. an Aero Precision X15 pistol bearing serial number X184424;
- b. a Glock G22 pistol bearing serial number NMK661; and,
- c. a Beretta 9mm Nano pistol bearing serial number NU053010.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE NOTICE

1. Upon conviction of the offense alleged in Count One of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation, and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation, including but not limited to the following:

- a. A sum of money equal to the amount of proceeds obtained as a result of the offense; and
- b. The U.S. currency recovered from the defendant's person and 408 W. Florida St., Unit 418, Milwaukee, Wisconsin, on May 26, 2021.

2. If any of the property described above, as a result of any act or omission by the defendant, cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third person, has been placed beyond the jurisdiction of the Court, has been substantially diminished in value, or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

3. Upon conviction of either the offense alleged in Count Two or Count Three of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in the offense of conviction, including but not limited to an Aero Precision X15 pistol bearing serial number X184424; a Glock G22 pistol bearing serial number NMK661; and a Beretta 9mm Nano pistol bearing serial number NU053010.

Ad
A TRUE BILL: 


FOREPERSON

Dated: *October 26, 2021*

for Margaret B. Hark
RICHARD G. FROHLING
Acting United States Attorney